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February 26, 2016

VIA ECF

Hon. Peggy Kuo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Cummins v. City of New York, et al.*, 15-CV-0096 (NG)(PK)

Your Honor:

I represent the plaintiff in the above-captioned action. I write with the consent of defense counsel to seek an extension of time to complete fact discovery from February 29, 2016 to April 15, 2016 and a corresponding extension for the other deadlines in the case.

The parties conducted the plaintiff's deposition on Wednesday and seek the additional time to be able to conduct the depositions of the officers. The additional time is needed to accommodate the schedules of both counsel and the officers. We thank the Court for its consideration of these requests.

Yours truly,

/ss/

Robert Marinelli

cc: ACC Daniel M. Braun
NYC Law Department